

Venezia, Leonard D. Jr.

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3 CIVIL ACTION NO. CV-02-03565
4 -----
5 SAFETY-KLEEN SYSTEMS, INC.,
6
7 Plaintiff,
8
9 v.
10
11 DON R. PENNELL,
12
13 Defendant.
14 -----
15 Philadelphia, Pennsylvania
16 Thursday, October 24, 2002
17
18 Transcript of testimony of LEONARD
19
20 D. VENEZIA, JR., as taken by and before
21
22 DENISE M. PITCHFORD, Federally-Approved
23
24 Registered Professional Reporter and
25
26 Commissioner of Deeds of the Commonwealth
27
28 of Pennsylvania, at the offices of
29
30 STRADLEY RONON STEVENS & YOUNG, LLP, 2600
31
32 One Commerce Square, commencing at 12:15
33
34 o'clock in the afternoon.
35
36
37

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1 lists that you were given by your company,
2 and three is an EPA haz-waste report?

3 A. Right.

4 Q. Any other ways that you can
5 think of?

6 A. No, not for me -- again,
7 personally for me, no.

8 Q. Now, this initial contract
9 list that you referred to, tell me what
10 that is.

11 A. That would be a list provided
12 by the company on Safety-Kleen customers
13 that were under contract that was, I
14 believe, placed originally by Safety-Kleen
15 on the Internet when they filed their
16 bankruptcy.

17 Q. Have you ever seen this on the
18 Internet?

19 A. I did not see it on the
20 Internet.

21 Q. Were you involved in any way
22 with placing it on the Internet?

23 A. Not at all.

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1 Q. Were you involved in any way
2 with retrieving it from the Internet?

3 A. Not at all.

4 Q. When did you first receive a
5 copy of the contract list?

6 A. Probably late January, early
7 February.

8 Q. How long had you been working
9 with Crystal Clean at that point in time?

10 A. Two weeks, three weeks.

11 Q. What was your understanding
12 with regard to what you were supposed to
13 do with that contract list?

14 A. It was more or less as a lead
15 list when we would go to visit customers.
16 It was to be used to make sales calls.

17 Q. Did you use the list to make
18 sales calls?

19 A. Yes.

20 Q. Did you -- strike that.

21 Approximately how many
22 businesses on the list do you think that
23 you visited?

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1 to 75 customers that your branch presently
2 services, how many of those customers
3 previously used Safety-Kleen for their
4 parts washer service?

5 A. It's probably about a -- I'm
6 going to guess and say it's about a 60/40
7 mix. 60 percent previous maybe
8 Safety-Kleen customers, 40 percent not.

9 Q. When was the last time or date
10 that you were employed with Safety-Kleen?

11 A. January 18th, '02.

12 Q. When was the first time you
13 had discussions with anyone about coming
14 to work at Crystal Clean?

15 A. That would have been probably
16 in late November -- I'm sorry, no. No, it
17 was probably mid December of '01.

18 Q. And who did you first have
19 discussions with about going to work at
20 Crystal Clean?

21 A. John Lucks.

22 Q. Tell me what led to those
23 discussions.